

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DONALD L. BUSBY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08 C 00136
)	
CITY OF CHICAGO, et al.)	Judge Joan B. Gottschall
)	Magistrate Judge Ashman
Defendants.)	

**DEFENDANT JAY B. ROSS' MOTION FOR AN EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant JAY B. ROSS, by and through his attorneys JAMES G. SOTOS & JOHN J. TIMBO of JAMES G. SOTOS & ASSOCIATES, LTD., move this Honorable Court for an extension of time to answer or otherwise plead. In support of this motion, Defendant states as follows:

1. The undersigned counsel for Jay Ross were appointed to the case on March 4, 2008, the same day as Defendant Ross' responsive pleading was due.
2. Since being served with Plaintiff's complaint on February 13, 2008, Defendant had been attempting to secure legal assistance through his professional liability insurance carrier.
3. As counsel for Defendant Ross have only been appointed to this case on March 4, 2008, Defendant needs additional time to review the allegations of the complaint before filing a response, by either answer or motion.
4. Accordingly, Defendant requests an extension of time, until March 26, 2008, to answer or otherwise plead.

5. This motion is not brought for any improper purpose or to unnecessarily delay these proceedings.

WHEREFORE, Defendant JAY ROSS respectfully requests that this Honorable Court grant him an extension of time to answer or otherwise plead, until March 26, 2008.

Dated: March 4, 2008

s/John J. Timbo

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Defendant Jay B. Ross

CERTIFICATE OF SERVICE

The undersigned having first been duly sworn under oath, states that he electronically filed a complete copy of the foregoing **Defendant Jay B. Ross' Motion for an Extension of Time to Answer or Otherwise Plead** with the Clerk of the Court on March 4, 2008 using the CM/ECF system, which will send notification of such filing to the following counsel of record: Amanda C. Antholt, Arthur R. Loevy, Jonathan I. Loevy, Michael I. Kanovitz, Diane S. Cohen, Melanie Patrick Neely, and Avi T. Kamionski.

s/John J. Timbo

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